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Director, Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

7 June 2016

Reply to a Notice of Violation (EA-16-081)

Dear Sir/Madam:

QSA Global, Inc. has received the subject NOV regarding the accuracy and timeliness of the 18 January 2016 advance notification for import. Please note that the sequence of events provided as an attachment to the NOV contains an error, in that QSA Global did not make the shipment on 25 January. This shipment was made by our customer in India.

We provide the following response specific to the NOV:

Violation: 18 January 2016 notification for a Category 2 quantity import from India contained inaccurate information, and subsequent corrective data provided to the Headquarters Operations Officer was initially erroneous.

Apparent cause: The errors in data provided to the NRC were due to lack of attention to detail by the QSA Global employee completing the notification form. The employee used an electronic version of the notification that had been submitted to the HOO several months earlier for an import coming from the same entity in India, but failed to overwrite all of the old information with the new data. When later queried on the discrepancy between the total activity on the form vs the total activity in the issuing email, the QSA Global employee confused the two activities and responded with the wrong value.

Corrective action: Employee was counseled on the importance of accurate transmission of information to the NRC, whether it be imports or exports, and to avoid the practice of overwriting an old notification.

QSA Global feels that we have addressed the subject violation as warranted. Please feel free to contact me if there are any questions.

Sincerely,

Michael Fuller, Director,
Regulatory Affairs/Quality Assurance